

File No. 1694-11

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN THE MATTER OF:

Chapter 13

Michael Jay Sparrowgrove  
Lisa Alice Sparrowgrove,

Case No. 06-00003

Honorable Judge Goldgar

Debtors.

**RESPONSE TO NOTICE OF CURE OF ALL PRE-PETITION  
MORTGAGE OBLIGATION**

Now comes, Litton Loan Servicing, LP and files this Response to the Trustee's Notice of Final Mortgage Cure Amount and in support states as follows:

1. That on September 28, 2009, Chapter 13 Trustee Glenn B. Stearns filed a Notice of Payment of Final Mortgage Cure Amount. The Notice was subsequently served on Litton and indicated that if the creditor is not post petition current, it must file a response within sixty days of said Notice. This response is being filed within that time frame. In the interim, the Debtors received a discharge.

2. The Debtors are not current on their post-petition mortgage payments on Litton's first lien regarding the real estate located at: 25172 Carson Drive, Lake Villa, Illinois ("Real Estate").

3. That since there is a post petition default the mortgage should not be considered fully reinstated.

4. The loan is post petition for escrow advances. The following is due and owing:

i. Post-petition mortgage payments from May 2009 through November 2009;

A) May 2009 through July 2009 monthly payments of \$1,207.21 for a  
total of \$3,621.63;

B) August 2009 through November 2009 monthly payments of  
\$1,098.89 for a total of \$4,395.50; and,

C) Less than \$196.18 in suspense.

The total post petition default totals \$7,821.01. Based upon Debtors' default, the mortgagee is not required to treat the mortgage reinstated and fully current. The creditor reserves the right to amend this response.

Respectfully submitted,

/s/ Mitchell A. Lieberman  
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